

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<b>ROBERT (BOB) ROSS,</b>	§	
	§	
<b>Plaintiff/Counterclaim Defendant,</b>	§	
	§	
<b>v.</b>	§	
	§	
<b>ASSOCIATION OF PROFESSIONAL FLIGHT ATTENDANTS, MCGAUGHEY, REBER AND ASSOCIATES, INC., JULIE HEDRICK, AND ERIK HARRIS,</b>	§	<b>Civil Action No. 4:22-cv-00343-Y</b>
	§	
	§	
	§	
<b>Defendants/Counterclaim Plaintiff.</b>	§	

**UNION DEFENDANTS' REPORT TO THE COURT REGARDING  
THE PARTIES' SETTLEMENT CONFERENCE**

In accordance with the Court's Initial Scheduling Order (Doc. 77) the parties participated in a formal settlement conference at which the parties and their counsel appeared in person to discuss settlement of this case. Defendant Counterclaim Plaintiff Association of Professional Flight Attendants ("APFA"), and Defendants Julie Hedrick and Erik Harris (collectively, "Union Defendants") file this written report in accordance therewith:

**(a) The date on which the settlement conference was held:**

The conference was held on March 27, 2023 in conference rooms reserved at the offices of Caddo Office Reimagined, 2201 Spinks Rd., Flower Mound, Texas 75022. The conference lasted for approximately two hours and thirty minutes.

**(b) The persons present at the conference:**

On behalf of Plaintiff Counterclaim Defendant Robert ("Bob") Ross:

1. Robert ("Bob") Ross;
2. Kerri Phillips, K.D. Phillips Law Firm, PLLC, participated as counsel for Robert ("Bob") Ross.

On behalf of the Union Defendants:

1. Julie Hedrick, APFA National President;
2. Erik Harris, APFA National Treasurer;
3. APFA participated through APFA Staff Attorney Charlette Matts, APFA National President Julie Hedrick and APFA National Treasurer Erik Harris, who each had authority to bargain in good faith on behalf of Defendant APFA; and
4. Sanford R. Denison, Baab & Denison, LLP, participated as counsel for the Union Defendants.

On behalf of Defendant McGaughey, Reber and Associates, Inc., d/b/a Diversified Credit Systems:

1. McGaughey, Reber and Associates, Inc. participated through Michael McGaughey, its president; and
2. Michael R Rake, Michael R. Rake, Attorney at Law, participated as counsel for McGaughey, Reber and Associates, Inc.

**(c) A statement regarding whether meaningful progress toward settlement was made:**

During the conference the parties and their counsel discussed various options which might serve as a framework within which to craft a resolution of this case as between Plaintiff and APFA; however ; however, despite the individual defendants' improper joinder as parties, no separate proposal for their dismissal apart from APFA was received from Plaintiff

Despite the parties' efforts to explore different settlement alternatives, the parties remain far apart with respect to settlement terms which would be acceptable to all parties and, from the Union Defendants' perspective, feasible as not requiring actions which violate APFA's Constitution, applicable law or the rights of APFA's other members.

While the parties and counsel were able to engage in a constructive discussion of their respective positions and views as to the terms of an acceptable and feasible resolution of this case, the parties were not able to make meaningful progress towards a settlement.

**(d) A statement regarding the prospects of settlement before trial.**

The Union Defendants have been and remain open to continuing to explore with Ross options for an agreed resolution of this case which is consistent with and does not run afoul of applicable law, the APFA's Constitution or the rights of its other members. However, as of this date, because the parties remain far apart with respect to settlement terms which are acceptable to all parties and which are feasible as consistent with APFA's obligations under law and its Constitution, the Union Defendants do not believe that the prospects for settlement prior to trial are good.

Date: April 3, 2023

Respectfully Submitted,

/s/ Sanford R. Denison  
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*Counsel for Defendant Counterclaim Plaintiff  
Association of Professional Flight Attendants, and  
Defendants Julie Hedrick and Erik Harris*

\*Admitted *Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I certify that on this 3rd day of April 2023 a true and correct copy of the foregoing document was served on the below listed counsel of record for Plaintiff/Counterclaim Defendant Ross by a means permitted by Rule 5(b)(2) of the Federal Rules of Civil Procedure (“F.R.C.P.”).

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/s/ Sanford R. Denison  
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